



MARKETING & COMMUNICATIONS: SOFT DRINKS STANDARD



CONTEXT

The Marketing & Communications Soft Drinks Standard ('The Standard') outlines the standards for developing soft drinks consumer-facing marketing or communications on behalf of Carlsberg Group and our brands. Alcohol-free variants of our alcohol brands do not fall under this policy and are covered by our Marketing & Communications Code. Compliance with this policy is mandatory for all markets. If local law and regulations are stricter than this policy, local law precedes.

OUR COMMITMENT

As a multinational beverage company with brands that millions of consumers enjoy every day, we understand that it is vital to communicate responsibly about our products. Carlsberg Group is committed to responsible advertising to all consumers, as shown through our adherence to the UNESDA's commitment regarding advertising to children, The World Federation of Advertisers' Responsible Marketing Pact, as well as the regional and national self-regulatory codes locally developed on that basis. Together, these codes help ensure our marketing provides legal, honest, decent, and truthful information about our products.

We follow relevant applicable national and local legislation and regulations. We also support voluntary industry codes of practice, wherever possible. All marketing activity must be in keeping with both the letter and the spirit of legislation, regulation and such codes.

WHO DOES THIS APPLY TO?

This Standard applies globally to the management, employees and contract workers of all entities in the Carlsberg Group.

The Standard sets out the principles that we will adopt in marketing our soft drinks brands across the world, whether marketed by us or any of our partners – and applies to companies who license our brands.

It applies to all marketing and advertising activities. All external marketing agencies and other partners must be fully briefed on the terms of the Standard and comply with its conditions. The requirement to comply with the Standard must be included in the terms and conditions of all contracts and in all activity/project briefs.

For brands we bottle on behalf of others, we follow their own marketing codes and policies. However, compliance with applicable laws and regulations always takes precedence.



REQUIREMENTS

1. TRANSPARENCY & INTEGRITY

- 1.1** We ensure that our communications are ethical, truthful, and never misleading.
- 1.2** All consumer-facing messaging is intentionally concise, clear and easy to understand. We avoid complex language that could cause confusion.
- 1.3** We ensure our communications are respectful and considerate of all audiences, avoiding any content that could be deemed offensive, discriminatory, or harmful.
- 1.4** We respect intellectual property rights, ensuring that all content is original and properly licensed.
- 1.5** Any claims about our products are compliant with applicable laws and should not be misleading or exaggerated.
- 1.6** We list ingredients and full nutrition declaration on consumer-facing primary or secondary packaging for all our soft drinks.

2. ENJOYMENT IN MODERATION AND AS PART OF A BALANCED DIET AND HEALTHY LIFESTYLE

- 2.1** We believe that any of our drinks can be enjoyed as part of a balanced diet and healthy lifestyle.
- 2.2** Where both regular and reduced-calorie variants of a brand are available, and where it is locally relevant and meaningful, marketing communications will feature reduced-calorie variants alongside the regular options.
- 2.3** We will comply with local legislation when making health and nutrition claims, and if no such legislation exists, these claims will be based on sound scientific evidence.
- 2.4** We acknowledge that our brands can be mixed with alcohol or consumed in an environment where alcohol is available, and any marketing activity in this context must support the principle of responsible

drinking, as set out in our Global Marketing & Communications Code. Any marketing in conjunction with alcohol will not target those younger than the legal purchase age for alcohol and consumers featured must be over 25 years old.

- 2.5** The labelling for energy drinks will include the wording *'High caffeine content. Not recommended for children or pregnant or breast-feeding women'*. Labels of energy drinks will also include the advisory statement "Consume moderately" or similar wording based on consumer understanding.
- 2.6** We will not market energy drinks to children under 13.
- 2.7** Labels on our energy drinks will not promote the mixing with alcohol or make any claims that the consumption of alcohol together with energy drinks counteracts the effects of alcohol. When promoting the benefits of energy drinks and their ingredients, we will not make any claims on alcohol together with energy drinks.
- 2.8** Our marketing will reflect the richness of the markets and communities where we operate and promote diversity and inclusion in society.

3. A RESPONSIBLE APPROACH TO MARKETING TO CHILDREN

- 3.1** We believe that a responsible approach to marketing to children is a central component in building trusted, accessible brands, and we are committed to supporting the right of parents and carers (the gatekeepers) to make the appropriate choices for their children.
- 3.2** We will not advertise our products in any media that is primarily directed at children under 13 years of age. This includes media specifically designed for, branded toward, or predominantly appealing to children. Only plain water and 100% fruit and vegetable juices can be marketed to children under 13.

REQUIREMENTS (CONT)

- 3.3.** We will not use celebrities, licensed characters, influencers or games whose primary appeal is to children under 13.
- 3.4.** We will not use movie tie-ins related to movies of primary appeal to children under 13.
- 3.5.** Where we show children under 13 in our marketing communications, they will reflect the principles of a balanced diet and active lifestyle.
- 3.6.** We respect the right of primary and secondary schools to be commercially free environments. We will not market our drinks in these schools, except for our water brands when invited by school authorities. We are happy to provide our drinks where they comply with relevant codes and may support charitable giving or social marketing campaigns upon request, but these will not promote our products. In other educational settings where most attendees are aged 13 or older, we may promote our soft drinks.

4. SUSTAINABLE BRAND CLAIMS

- 4.1.** We always ensure our communication on sustainability matters is honest, contextualised and supported by evidence.
- 4.2.** We ensure that any claims of environmental sustainability benefits:
 - Are appropriately contextualised (e.g., we take the full product life cycle into account when making any green claims) and substantiated with evidence (e.g. Life Cycle Assessment ('LCA') or a recognised certification scheme). The LCA should be documented properly, and the results must be verified by a third party.
 - Are as specific as possible, avoiding vague general terms like "sustainable" and "green" which cannot be substantiated, and not exaggerated or misleading in any way. For example, if a claim is focused on one element, e.g., packaging, it should be specific to that and not imply a wider overall benefit.

- Avoid jargon terms that could be misunderstood. Any relevant information to the consumer is included to help understanding and if the claim requires a supporting statement, this is presented in a clear way, with a legible text size and linked by an * to the claim itself. The logos or images should include a supporting statement if required to explain the image. They should not exaggerate the benefit in any way.
- Are relevant to our business and business sustainability strategy e.g., cutting carbon, water replenishment, recycling etc.
- When making comparative environmental claims, care is taken to ensure the claim is clear, relevant, and accurate. The basis of the comparison should be consistent.
- Comply with national and, where applicable, EU regulations related to green claims, and Carlsberg's Environmental Claims guidelines.
- Are approved by market legal or regulatory function.

5. ENVIRONMENTALLY CONSCIOUS

- 5.1.** Where relevant, we use our marketing platforms to educate consumers about the importance of sustainability. We encourage environmentally sustainable behaviour in our communications.
- 5.2.** Where appropriate, our consumer and trade marketing will encourage recycling and reducing the impact of littering. And in relevant markets all consumer and trade advertising will carry recycling messages.
- 5.3.** We will leverage the scale and reach of our brands to inspire change and as such, in relevant markets, our packaging will carry recycling messages that enable consumers to dispose of packaging correctly and responsibly.

REQUIREMENTS (CONT)

5.4. We prioritise the use of recycled, recyclable, reusable, and compostable materials for all physical marketing collateral.

5.5. Our events strive to incorporate responsible sourcing and waste reduction practices, including but not limited to waste sorting and procuring recycled, recyclable, reusable, and compostable materials.

6. SOCIALLY INCLUSIVE

6.1. Diversity, equity & inclusion is a priority for Carlsberg, which means all our marketing and communications are inclusive and respectful of the diverse communities we serve.

6.2. Our communication will always be sensitive to, and respectful of, the diversity of our society, including but not limited to race, ethnicity, religion, gender, age, sexual orientation, disability, and socio-economic status. We encourage our partners to have diverse staffing, and we ensure that our media ‘safeguarding protocols and words’ do not work against supporting diverse platforms and communities.

6.3. We are sensitive to cultural differences and ensure that any communication and its themes are not considered inappropriate or culturally insensitive across the markets we operate in.

6.4. We consciously avoid perpetuating any harmful stereotypes, using discriminatory language or stigmatising any group of people.

6.5. We partner with influencers, ambassadors, and organisations that share our commitment to social inclusion and responsible approach to marketing to children.

6.6. We prioritise working with external partners and organisations that champion social inclusivity in their employment practices.

HOW TO REPORT A BREACH

You are responsible for asking questions, seeking guidance and reporting any suspected violations regarding compliance with our policies and standards. If you see or suspect that any employee or representative of Carlsberg has or is engaging in conduct that violates this Standard, you should report this to your manager or compliance representative. Alternatively, our Speak Up whistleblowing phone line and web reporting tool can also be accessed anonymously by employees, by those in our value chain and the communities we operate. Where matters are brought to us, we are committed to protecting the rights of those reporting them and we do not tolerate any reprisal against anyone who raises a matter in good faith or where they have assisted an investigation.

The **Speak Up Policy** contains more information about how cases are investigated.

DEFINITIONS & KEY TERMS

Energy drinks

Functional beverages with a stimulating effect and unique combinations of characterising ingredients including caffeine, taurine, vitamins and other substances with a nutrition or physiological effect. For the purposes of this Standard the term “Energy drinks” will be used throughout to refer to high caffeine beverages containing more than 150mg/l of caffeine.

Lifecycle assessment (LCA)

Is defined by the ISO 14040 as the compilation and evaluation of the inputs, outputs and the potential environmental impacts of a product system throughout its life cycle.



ROLES & RESPONSIBILITIES

BODY / FUNCTION	ROLES & RESPONSIBILITIES
ExCom Policy Sponsor - Group Marketing (CMO)	<ul style="list-style-type: none"> • Provides strategic oversight, ensures resources are allocated, and champions the Standard at the executive level. • Overall responsibility to ExCom for marketing & communications issues in Carlsberg Group. Responsible for ensuring material marketing communication risks in the Group are attended to and communicated to ExCom/the Audit Committee/the Supervisory Board.
Standard Owner & Subject Matter Expert Soft drinks	<ul style="list-style-type: none"> • Responsible for the overall lifecycle of the Standard, ensuring alignment with the organisation’s strategy, compliance requirements, and operational needs. • Accountable for the final approval. • Defines and delivers an annual risk-based activity plan & training toolkit. • Approves, monitors adherence and provides guidance on all exceptions and variations. • Provides in-depth expertise on the subject matter, supporting its development, implementation, and ongoing maintenance.
Subject Matter Expert ESG	<ul style="list-style-type: none"> • Provides sustainability expertise on the subject matter, especially in relation to making any environmental claims.
Global/Local Marketing Director	<ul style="list-style-type: none"> • Responsible for implementing the global Standard locally, adapting it to regional requirements while maintaining alignment.
Local Brand Owners	<ul style="list-style-type: none"> • Responsible for verifying and validating marketing materials against the Standard.
Local Legal Counsel & Corporate Affairs	<ul style="list-style-type: none"> • Responsible for verifying marketing materials against legal requirements/stakeholder views/industry standards.
VP Group Corporate Affairs	<ul style="list-style-type: none"> • Joint final decision-maker in the event of escalation.
CMO	<ul style="list-style-type: none"> • Joint final decision-maker in the event of escalation.
All relevant managers and employees in the Carlsberg Group	<ul style="list-style-type: none"> • Responsible for understanding and complying with the Standard in their day-to-day work. • Informed about the Standard updates and trained on how to comply effectively. • If in doubt, always contact their local Marketing & Communications or Compliance Representative who shall, if needed, verify with Group VP Marketing – Soft drinks.

HOW WE MONITOR

We monitor the adherence to our codes policies and standards through an internal controls assessment program carried out in partnership with our internal controls team. Furthermore, risks are mapped annually and self-assessed. Also, a prioritised internal audit program or specific deep dives and spot checks for compliance ensure independent assurance.

Failure to adhere to the key principles or failure to deliver appropriate mitigation may result in disciplinary action.

EXCEPTIONS & DEVIATIONS

Exceptions to this Standard shall not be granted, unless exceptional conditions exist, or the Standard is not applicable. Any request for an exception shall be put in writing to the Standard Owner. The Standard Owner shall assess and decide on each request individually. Exceptions shall be duly logged and documented.

ASSOCIATED STANDARDS & MANUALS

- [Global Marketing & Communications Code](#)
- [Environmental Policy](#)
- [Speak Up Global Policy](#)

STANDARD REVISION

This Standard will be revised when needed but as a minimum every year. It may be amended at any time with the approval of the relevant ExCom Sponsor. In the event of any discrepancies between the English version of this Standard and a translated version, the English version is binding.

SUPPORTING TOOLS AND RESOURCES

Local Legal, Regulatory and Corporate Affairs teams can provide support interpreting the Standard and local legislation. They should be consulted as early as possible during the development of marketing or communications materials. When in doubt, or in the event of suspected non-compliance, the situation should be escalated to Group Marketing and Group Corporate Affairs departments.



CONTACT

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